EDMONTON METROPOLITAN REGIONAL PLANNING COMMISSION
Suite 600, Baker Centre, 10025 - 106 Street, Edmonton, Alberta T5J 1G4
Phone (403) 423-5701

Ross G. Quinn
CHAIRMAN

R.G. Madziya, M.A., M.C.I.P.
EXECUTIVE DIRECTOR

YOUR FILE .....

OUR FILE 473-1

January 8, 1986

Hon. Fred D. Bradley
Minister of the Environment

Hon. E. LeRoy Fjordbotten
Minister of Agriculture

Hon. Julian G.J. Koziak
Minister of Municipal Affairs

Dear Sirs:

Re: Agricultural Land, the Edmonton Metropolitan Regional Planning Commission Position in response to the Environment Council of Alberta's Report and Recommendations for Maintaining and Expanding the Agricultural Land Base in Alberta

It is our pleasure to present this report to you for your consideration. Maintaining and expanding the agricultural land base in the Province, and more specifically in the Edmonton metropolitan region is an issue that has been before the Commission on numerous occasions. Our experience over the past thirty-five years, has led to a number of practices, policies and plans being adopted and implemented, and it is within the context of this experience that our position has been formulated.

We trust that you will give our position thoughtful consideration in developing a long term Provincial strategy for maintaining and expanding the agricultural land base.

Yours truly,

Ross Quinn, Chairman

R. G. Madziya, Executive Director

c.c. Environment Council of Alberta
Commission Member Municipalities
Alberta Planning Board
Edmonton Metropolitan Region MLA's

AGRICULTURAL LAND

An Edmonton Metropolitan Regional Planning Commission Position in response to the Environment Council of Alberta's Report and Recommendations for Maintaining and Expanding The Agricultural Land Base in Alberta

EDMONTON METROPOLITAN REGIONAL PLANNING COMMISSION
6TH Floor, 10025 - 106 Street
EDMONTON, Alberta
T5J 1G4
File 473-1
Telephone: 423-5701
December, 1985

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I. INTRODUCTION

Agricultural land is a finite resource. The issue of maintaining and expanding the agricultural land base has been addressed by the Environment Council of Alberta (E.C.A.) including the holding of a series of public hearings during the fall of 1983, and by publishing their final Report and Recommendations in December, 1984.

The Edmonton Metropolitan Regional Planning Commission has formulated a position with respect to the E.C.A.'s final Report and Recommendations. This position is based upon our submission at the public hearing in December, 1983, our assessment of the E.C.A. report and recommendations, and Commission and Committee discussions and deliberations.

II. THE E.M.R.P.C. POSITION

The Commission's position deals specifically with recommendations 1, 2, 4, 5, 6, 7, 8, 10, 13, 14, 28 and 29 from the E.C.A. report. E.C.A. recommendations 3, 9 and 17 to 22 have not been included because the Commission has given those recommendations their full support. E.C.A. recommendations 11, 12, 15, 16 and 23 to 27 have not been included because they do not apply to this Commission.

1. E.C.A. Recommendation 1

> That an Agricultural Resources Conservation Board be established, reporting to the Minister of Agriculture and charged with responsibility on behalf of the Government of Alberta for the conservation, maintenance, and enhancement of the agricultural land base.

The Edmonton Metropolitan Regional Planning Commission (E.M.R.P.C.) does not support this recommendation. The reasons for non-support are as follows.

(a) The E.M.R.P.C. advocated, in its public hearing brief, that a consistent Provincial strategy was needed to protect and enhance the agricultural land base. However, the establishment of an Agricultural Resources Conservation Board (A.R.C.B.), or a similar authority, was not envisioned, as it was the Commission's position that Regional Planning Commissions are already established in a large portion of the Province, and that they have the capability to assist in implementing a Provincial strategy. Expanding the mandate of existing agencies, such as the Commission and Alberta Agriculture, is all that is required to implement a provincial strategy.

(b) This view is consistent with comments submitted to the Commission by some of its member municipalities and expressed to the E.C.A. by other Regional Planning Commissions - namely, that a new authority would complicate the regulatory environment, duplicate existing services, and create an unnecessary public body.

What appears to be missing is a clear Provincial strategy. Once this strategy has been established, it could then be implemented by greater liaison with those agencies currently charged with the responsibility, which includes Regional Planning Commissions. It is interesting to note that the Provincial Government has many regulations and policy statements affecting oil, natural gas, coal and gravel, but not on agricultural land which, in our opinion, needs more Provincial direction.

2. E.C.A. Recommendation 2

That the responsibility for the maintenance of the agricultural land base rest with the rural municipalities of Alberta. The responsibility to protect the agricultural land base should be accompanied by the power and authority necessary to achieve this objective.

The Commission does not support this recommendation. The reasons for non-support are as follows.

(a) The E.C.A. is advocating that all rural municipalities become their own subdivision approving authorities (outlined in the explanatory section).

Although it may be beneficial that a municipal subdivision approval authority be created in some cases, the E.C.A.'s rationale for making this recommendation assumes that all rural municipalities in the Province will protect agricultural land, and that this protection will be undertaken in a consistent manner. In this regard, it should be noted that the possibility of rural municipalities becoming their own subdivision approving authorities, currently exists under the provisions of the Planning Act. Given the fact that, very few rural municipalities have applied for and received this authority (two in the E.M.R.P.C. Region) and that a general consensus of opinion of those rural municipalities without subdivision approving authority seems to be that it is undesirable, the E.C.A. recommendation may be without basis. Also, urban municipalities have the same responsibility as rural municipalities for the maintenance and protection of agricultural land.

(b) The report also recommends that the right of appeal to a higher authority (outlined in the explanation supporting this recommendation) be eliminated. Appeal to a higher authority should be maintained.

(c) It appears that the E.C.A. has not examined the implications for the regional planning system or the consequences for municipalities which could lose a valuable and efficient planning advisory service provided by Regional Planning Commissions. While subdivision processing may appear to the E.C.A. to be a fairly routine administrative function, it is one that requires political as well as professional input and decision making.

3. E.C.A. Recommendation 4

> That the location of feedlots and intensive agricultural operations be a matter of municipal control under land use by-laws.

The Commission supports the intent of this recommendation.

To a certain extent, this is what is being done at the present time, with input from Alberta Agriculture and Alberta Environment through the issuance of a Certificate of Compliance, and by the Subdivision Regulation under the Planning Act. The E.M.R.P.C. is of the opinion that these broader Provincial regulations should remain, with the prerogative for stricter control left with the local municipalities. Furthermore, the Edmonton Metropolitan Regional Plan contains specific policy sections which address themselves to this issue.

4. E.C.A. Recommendation 5

> The agricultural production lost when land is removed from agriculture should be replaced either by support of agricultural research and development or by practices and programs which would permanently replace the lost production.

The E.M.R.P.C. does not support this recommendation.

(a) The underlying philosophy for the establishment of an Agricultural Productivity Fund seems to indicate that the E.C.A. has placed too much emphasis on increasing agricultural productivity, instead of maintaining the finite land resource that exists. Productivity increases are short term goals that are closely linked to world economics and may also, over the longer term, deplete the agricultural capability of the lands being used. Therefore, instead of directing funds only to increase productivity, greater emphasis should be placed upon the maintenance of existing agricultural land.

(b) The purpose and intent of this recommendation are laudable. However, the specifics of administration may reveal that further investigation and amendment are warranted. For example, it is assumed that the same 1:6 loss/compensation payment ratio (mentioned in the explanatory section) would be applied equally throughout the Province. The net result may be an encouragement of agricultural land conversion adjacent to larger urban centres, since costs are more easily absorbed in those areas.

(c) There are differences in the value judgements of different assessors. Even though the Farmland Assessment Manual contains a fair amount of scientific rigour, individual value judgements cannot be avoided.

(d) The basic assumption presented, in regard to the Agricultural Productivity Fund, is that in areas of historical agricultural use, such as the Edmonton Region, all land of higher farmland capability is being farmed. To a limited degree, the E.M.R.P.C.'s Lake Management Programme has revealed that significant areas of high farmland capability soils are under tree cover.

5. E.C.A. Recommendation 6

Future additional country residential lots can be accommodated with a minimal impact on the agricultural land base, if the suggested guidelines are followed.

The Commission does not support this recommendation, especially the guidelines that have been formulated to implement it.

(a) E.C.A. Guideline (a), recommending the elimination of the regulation prohibiting country residential subdivision within five miles of a town with a population of over 5,000, is unnecessary. This provision is currently available through the adoption of a regional plan, which could contain policies stating that such action may be permitted. As stated in Section 20 of the Subdivision Regulation, "Unless otherwise permitted in a regional plan ...".

(b) E.C.A. Guideline (b), encouraging the subdivision of agricultural land within an urban municipality for large lot residential and country residential use as an interim measure, is questionable. Even with "judicious" preplanning, this approach seems to recommend the premature conversion of agricultural land into non-agricultural uses. Agricultural land, whether it is within or outside the boundaries of an urban municipality, should be maintained in its productive state for as long as possible.

(c) E.C.A. Guideline (c), recommending resubdivision of existing country residential subdivisions, does not appear to be judicious preplanning. Unless a larger area composed of subdivided country residential lots and unsubdivided lands is preplanned within the framework of an area structure plan process, to guide land use and subdivision over the longer term, random resubdivision of existing country residential areas will only further complicate existing problems.

(d) E.C.A. Guideline (d), setting directives for future subdivision and resubdivision of country residential areas, is acceptable, providing it is consistently implemented through regional plans and municipal statutory plans.

6. E.C.A. Recommendation 7

> Municipalities should be urged to collect information on the cost of providing services to various types of uses in different areas of the municipality relating to different levels of existing and proposed infrastructure.

The E.M.R.P.C. supports this recommendation as it appears to complement Recommendation 3. However, a more important consideration than the collection of information, is the effective analysis and interpretation of that information. There are economic planning tools available that could be used by the municipalities and the Regional Planning Commissions to obtain information, as well as analyze and interpret these types of situations.

7. E.C.A. Recommendation 8

> That an agricultural land use classification be developed that identifies the ability of the soil to be continuously utilized for different types of agriculture without major degradation.

The Commission supports the intent of this recommendation. The identification of agricultural areas through a classification system, supports the recommendation outlined in our brief, which called for a more detailed soils information base throughout the settled portions of the Province.

8. E.C.A. Recommendation 10

> That the Planning Act and Regulations be amended to provide for the implementation of rural replotting schemes.

The Commission supports this recommendation.

The E.M.R.P.C.'s interpretation of Sections 123 - 135 of the Planning Act is that urban, as well as rural replotting schemes are currently permitted. However, more specific guidance may be required to implement these larger scale replotting schemes.

9. E.C.A. Recommendation 13

> An agricultural development permit, issued by the Agricultural Service Board, should be required to clear or break land. Permits could identify special conditions under which clearing or breaking should take place.

The E.M.R.P.C. does not support this recommendation.

Although the intent of this recommendation is laudable, the process is questionable. Permits should not be required to break or clear land but rather should be required for the proposed use of land. As a condition of that permit, certain areas of trees could be required to be left intact for environmental or other reasons. The process appears to be possible under the Planning Act and through the administration of the land use by-law but is not being used in the rural municipalities. More importantly, if an Agricultural Development Permit system under the purview of Agricultural Service Boards is invoked, it may conflict or overlap with the present development permit system developed pursuant to the land use by-law.

10. E.C.A. Recommendation 14

> That the rural municipality be given the responsibility for reclamation not dealt with under the Land Surface Conservation and Reclamation Act's regulated surface disturbances provisions. This proposal is not intended to replace direct negotiation between the applicant and the landowner for right of entry.

The Commission supports the intent of this recommendation.

The principle is good but it makes some assumptions, such as the "municipal inspection and reclamation officer's role" (as described in the explanatory section). It is not known whether that implies that such a position should be created, or that the role be fulfilled by the municipal development officer. The role of a council is a legislative and not a judicial one, as such all appeals should be to the development appeal board not to the council. It should be noted, however, that a municipal council can act as the development appeal board in some instances.

11. E.C.A. Recommendation 28

> That all land and buildings used for primary food production that are annexed to an urban municipality be treated for assessment purposes as though they had remained in the rural municipal jurisdiction, accompanied by municipal service levels similar to those of the rural municipality, until these lands are converted to a use other than agriculture.

The E.M.R.P.C. does not support this recommendation. Although it would ensure the continued operation of an agricultural use within an urban municipality, this recommendation does not allow for the large commercial operations that are often associated with agricultural operations.

12. E.C.A. Recommendation 29

> That greenhouse buildings and land be assessed as agricultural for municipal tax purposes.

The E.M.R.P.C. does not support this recommendation. As in recommendation 28, this recommendation does not consider the large scale commercial operations that are usually part of a greenhouse facility.

APPENDIX 1

Appendix 1 Municipal Comments submitted to the Commission with respect to the Environment Council of Alberta's Final Report and Recommendations

The City of Edmonton

OFFICE OF THE CITY CLERK

MAR 12 1985

March 08, 1985

D.1.
(PART I)
10.

E. L. Dmytruk
Planning Manager
Regional Planning & Research
Edmonton Metropolitan Regional Planning Commission
Baker Centre
602, 10025 - 106 Street
Edmonton, Alberta
T5J 1G4

Dear Mr. Dmytruk::

Re: Alderman Butti re: Environment Council of Alberta Summary Report Entitled Maintaining and Expanding the Agricultural Land Base in Alberta

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The above-noted item was submitted to the regular meeting of City Council held Tuesday, February 26, 1985 at which time the following recommendation of the Executive Committee was concurred in:

"That the initial response be received as information."

Yours truly,

C. J. McGonigle
City Clerk

/nr
enc.

HOME OF UNIVERSIADE 83

B.2.i

Alderman Butti re: Environment Council of Alberta Summary Report Entitled Maintaining and Expanding the Agricultural Land Base in Alberta

RECOMMENDATION: That the following report be received as information.

HISTORY

Through a memorandum dated February 8, 1985, Alderman Butti requested that the Administration review the captionally-noted report.

REPORT

The report released by the Environment Council of Alberta (ECA) puts forward twenty-nine recommendations outlining means for maintaining and expanding the agricultural land base and for maintaining its production. Given the importance of agri-business to the provincial economy, the Government of Alberta and the ECA should be lauded in this regard. However, a number of recommendations have potential impacts on the management of agricultural land within the annexed area and the subsequent transition of these lands from agricultural to urban uses. The potential implications of these recommendations are briefly discussed below.

Recommendation 1: The Establishment of the Agricultural Resources Conservation Board (ARCB)

The establishment of the ARCB has little impact on the City other than a requirement for the City to collect compensation contributions for the Agricultural Productivity Compensation Fund (See Recommendation 5).

Recommendation 2: Expanded Rural Approving Authority

The expanded authority for rural municipalities has limited impact on the City other than granting a rural municipality the authority to require an urban municipality to file an Agricultural Land Impact Assessment Statement in conjunction with an annexation petition.

Recommendation 5: Compensation Payments for the Loss of Agricultural Land

The recommendation proposes a system whereby all transfers of land from agricultural uses to non-agricultural uses would be subject to a compensation payment. The payment would be collected from the owner of record at the time agricultural land loses its agricultural assessment. It is proposed that the local municipality would collect these payments on behalf of the Agricultural Resources Conservation Board. Based on the proposed compensation formula (six times the agricultural productivity of the land), the compensation payment for removing land from agricultural production to accommodate urban development would be in the order of $2000 to $2500 per acre. Although there is some merit in this proposal from the perspective of conserving the Province's agricultural land base, there is the potential for substantially increasing urban land costs. As such, it is recommended that the City reserve comment on this matter until such time as the fiscal implications of the proposed compensation system can be assessed in greater detail.

Recommendation 6: Country Residential Development as an Interim Land Use

In putting forward guidelines regarding future country residential development, the ECA suggests that in those instances where urban municipalities have annexed extensive areas of farmland "country residential uses . . . should be encouraged . . . as an interim use". The Planning Department disagrees with such an approach due to the negative impacts associated with developing lands under a fragmented ownership pattern and the increased costs associated with redeveloping country residential uses to higher density urban uses.

Recommendation 28: Assessment for Agricultural Properties

The recommendation proposes that all annexed agricultural land and buildings used for primary food production be treated for assessment purposes as though they remained under the jurisdiction of a rural municipality. This recommendation is consistent with the intent of GMP policy 14.A and with the Planning Department's draft Agricultural Land Management Program.

Recommendation 29: Assessment for Greenhouse Operations

The recommendation proposes that greenhouse buildings be assessed as agricultural for municipal tax purposes. This recommendation is consistent with the Planning Department's draft Agricultural Land Management Program.

ENCLOSURE

1 Summary of ECA Recommendations

Written by: Wayne Cameron
Approved by: Jane Fleming
Planning Department
February 15, 1985

ENCLOSURE I

SUMMARY OF ECA RECOMMENDATIONS

Recommendation 1

That an Agricultural Resources Conservation Board be established, reporting to the Minister of Agriculture and charged with responsibility on behalf of the Government of Alberta for the conservation, maintenance, and enhancement of the agricultural land base.

Recommendation 2

That the responsibility for the maintenance of the agricultural land base rest with the rural municipalities of Alberta. The responsibility to protect the agricultural land base should be accompanied by the power and authority necessary to achieve this objective.

Recommendation 3

In the identification of the appropriate growth options for major roads, utilities, and the expansion through annexation of residential, commercial, and industrial developments, the regional planning commissions should develop benefit/cost analyses of the alternatives that consider not only the cost to the urban centres but the costs to the economy as a whole of the various alternatives for development.

Recommendation 4

That the location of feedlots and intensive agricultural operations be a matter of municipal control under land use bylaws.

Recommendation 5

The agricultural production lost when land is removed from agriculture should be replaced either by support of agricultural research and development or by practices and programs which would permanently replace the lost production.

Recommendation 6

Future additional country residential lots can be accommodated with a minimal impact on the agricultural land base, if the suggested guidelines are followed.

Recommendation 7

Municipalities should be urged to collect information on the cost of providing services to various types of uses in different areas of the municipality relating to different levels of existing and proposed infrastructure.

Recommendation 8

That an agricultural land use classification be developed that identifies the ability of the soil to be continuously utilized for different types of agriculture without major degradation.

Recommendation 9

That there be provision for the establishment of "Soil Reclamation Districts" whereby two-thirds of the landowners within defined boundaries may determine the remedies necessary to arrest soil degradation and/or reclaim lands presently subject to degradation. Within Soil Reclamation Districts, constant dollar or low-interest loan funding should be available to help carry out remedial measures, with repayment to be compatible with benefits derived.

Recommendation 10

That the Planning Act and Regulations be amended to provide for the implementation of rural replotting schemes.

Recommendation 11

This Panel supports the recommendation in the report on soil conservation by the Standing Committee on Agriculture, Fisheries, and Forestry, to the Senate of Canada, "reading

> That the Canadian Wheat Board modify the quota system to extend (a) full quota entitlement, at the "bonused" level of seeded acreage, to those remnant farmlands considered of marginal value for agriculture; and (b) partial quota entitlement, equivalent to current quota levels for summerfallow, to extensive tracts of unimproved pastureland which form integral parts of farm units. (p. 12)

Recommendation 12

The Panel believes that the method of calculating coverage and payouts should be neutral as between planting on summerfallow or stubble. Since there are many technical details and complications in achieving this objective, the Panel calls on the Canada-Alberta Crop Insurance Corporation to give this matter their urgent consideration.

Recommendation 13

An agricultural development permit, issued by the Agricultural Service Board, should be required to clear or break land. Permits could identify special conditions under which clearing or breaking should take place.

Recommendation 14

That the rural municipality be given the responsibility for reclamation not dealt with under the Land Surface Conservation and Reclamation Act's regulated surface disturbances provisions. This proposal is not intended to replace direct negotiation between the applicant and the landowner for right of entry.

Recommendation 15

That the Government of Alberta work toward the removal of all inter-governmental barriers to free trade in beef, whether at the feeder cattle or finished stage. Particular attention should be paid to indirect barriers, including excessive levels of subsidy to develop beef cattle industries.

If, after fully canvassing the potential for free trade in beef at the provincial, national, and international level, the conclusion on potential expansion is negative, the Government of Alberta should institute special beef marketing programs. These might include special transportation assistance to market beef in new market areas, additional research on new forms of beef products, packaging, processing, transportation, and storage, and continuing follow-up and reassessment of existing programs and initiatives.

Recommendation 16

Export marketing of grass and forage products should involve product-orient task groups representing each element in the chain from producer to consumer.

Recommendation 17

That research be carried out to provide more information on the maintenance of and amendments to Alberta agricultural soils.

Recommendation 18

That a research fund be established to study soil reclamation and effects of industry on agriculture. This fund could be developed by contributions from industry, matched by government.

Recommendation 19

Research should be carried out on an ongoing basis to study the long-term effects of agricultural chemicals on soils.

Recommendation 20

More funding for production research should be provided, and there should be a closer liaison between provincial and federal research institutions. Producers should be encouraged to contribute to research funding through a levy on sales of production.

Recommendation 21

More research into grass and forage production is required, particularly into methods of increasing yields per acre.

Recommendation 22

That Agricultural Service Boards be encouraged to act as a practical research liaison within their jurisdiction in determining local research needs and in planning and managing projects.

Recommendation 23

That a research project be instituted to identify the full range of benefits and costs of various government incentive and subsidy programs on the sectors of the agricultural economy that they were intended to assist, as well as on other parts of agriculture and the larger economy.

Recommendation 24

Provincial programs of expansion and intensification should be assessed and priorized on the basis of the following guidelines.

Recommendation 25

That northern agricultural land base expansion be limited to the fringes of existing agricultural settlements until more is known about potential expansion areas.

Recommendation 26

A Range Management Agreement should have a 20-year term renewable in the tenth year. Any increment of grazing capacity that was due to good management by the lessee, or range improvements carried out at the lessee's cost, should accrue to the lessee, even if this were to exceed the existing 600 animal unit limitation on size.

Recommendation 27

Grazing reserve expansion should be restricted to those cases where a grazing association indicates its willingness to undertake all costs of maintenance and operation. The responsibility for maintenance and operation of existing reserves should be turned over to local grazing associations as quickly as possible.

Recommendation 28

That all land and buildings used for primary food production that are annexed to an urban municipality be treated for assessment purposes as though they had remained in the rural municipal jurisdiction, accompanied by municipal service levels similar to those of the rural municipality, until these lands are converted to a use other than agriculture.

Recommendation 29

That greenhouse buildings and land be assessed as agriculture for municipal tax purposes.

Edmonton

OFFICE OF THE ALDERMEN

MEMORANDUM

8 02 85

Spoke to Doug Lychak's office re: response

TO: Mayor Laurence Decore

COPY TO: Doug Lychak

FROM: Alderman Olivia Butti

SUBJECT: Report and Recommendations: Maintaining and Expanding the Agricultural Land Base in Alberta

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As your representative to the Regional Planning Commission and also the A.U.M.A., it has come to my attention that both have recently received a Summary of Report and Recommendations: Maintaining and Expanding the Agricultural Land Base in Alberta. Both the commission and association have been requested to review the report and respond to the Environment Council of Alberta.

The A.U.M.A. Legislative Committee and E.M.R.P.C. Regional Planning Commission have been asked to review the document and bring back recommendations to the board meetings.

I am enclosing the report and would suggest our Administration thoroughly review and bring back recommendations, in order that the City of Edmonton can have a position. I would like to know primarily, the effects that might be felt in the annexed areas.

I would appreciate receiving the City's position prior to February 22nd.

Thank you.

February 11, 1985 - Refer to Planning

Please provide report for walk-on at February 20th Executive Committee Meeting. Deadline FEBRUARY 18

B. Dolman/cc

C. Bumstead for C.B.

OB/cc
Encl.

191 4300

Town of Morinville

Ville de Morinville

Phone (403) 939-4361

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Morinville, Alberta
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March 13, 1985

RECEIVED
MAR 18 1985
Edmonton Metropolitan
Regional Planning Commission

Edmonton Metropolitan Regional
Planning Commission
602 - 10025 - 106 Street
EDMONTON, Alberta
T5J 1G4

Attention: Mr. E. L. Dmytruk
Planning Manager
Regional Planning & Research

Dear Sir:

Re: Environment Council of Alberta - Summary Report and Recommendations Maintaining and Expanding the Agricultural Land Base in Alberta, December, 1984

While we understand there should be a concern for the maintenance and expansion of the agricultural land base, we are also concerned with some of the recommendations made by the Environment Council of Alberta Panel in the above document and would comment as follows:

Recommendation 1

Is it necessary to establish another board? Would this be duplication of existing services provided by Alberta Agriculture or that could be provided by Alberta Agriculture? We are greatly concerned that we are looking at another level of bureaucracy.

Recommendation 2

That the responsibility for the maintenance of the agricultural land base rest with the rural municipalities of Alberta. The responsibility to protect the agricultural land base should be accompanied by the power and authority necessary to achieve this objective.

. . . 2

The Panel is of the opinion that local decision makers are able to make the best assessment of what is appropriate for their area with regard to land use changes and subdivision approval. Is it the Panel's opinion that all municipalities hire additional personnel or re-train existing personnel in order that they be knowledgeable with regard to the subdivision approval process.

The Panel also states that municipalities should be required to ask for the comments of their agricultural service boards on any land use amendment, development permit or rural subdivision application that might affect the agricultural land base. The Panel adds that having obtained that advise, it should become the municipalities full responsibility without overriding direction from or appeal to any provincial department or its agency, to approve rural subdivision. This could mean that a rural municipality could approve a subdivision adjacent to an urban municipality's boundaries and the urban municipality or residents of that municipality would have no right of appeal. As well, residents of the rural municipality would have no right to appeal. I would strongly suggest that the right to appeal to the Alberta Planning Board is very important and should be retained.

The Panel further states with respect to urban annexation that a rural municipality that is subject to an urban annexation application has the right to apply to the Local Authorities Board for an agricultural impact assessment to be prepared for the lands under annexation application. The cost of the agricultural impact assessment would be paid for by the applicant for annexation, but the rural municipality would award the contract for the preparation of the AIA to standards to be established by the Agricultural Resources Conservation Board. This seems to be bureaucracy in its finest form. Applications for annexation are now made through Local Authorities Board with public hearings held and it is felt that the present regulations are adequate for the protection of agricultural lands.

Recommendtion 3

In the identification of the appropriate growth options for major roads, utilities, and the expansion through annexation of residential, commercial, and industrial developments, the Regional Planning Commission should develop benefits/cost analysis of the alternatives that consider not only the cost to the urban centers but the costs to the economy as a whole, of the various alternatives for development.

One can understand why this recommendation was arrived at, however, we are of the opinion that the Regional Commissions would require additional qualified staff in order to carry out the proposed analysis and these costs in turn

. . . 3

would be passed on to the municipalities. This would also delay development and we feel it is difficult now to bring development on stream without adding to the difficulties.

Recommendation 4

That the location of feedlots and intensive agricultural operations be a matter of municipal control under Land Use Bylaws.

This would not allow input by urban municipalities when proposed use is adjacent to their boundaries.

Recommendation 5

Agricultural production lost when land is removed from agriculture should be replaced either by support of agricultural research and development or by practices and programs which would permanently replace the lost production.

The Panel states in part that when agricultural land is transferred to non-agricultural use, this contribution to the larger provincial economy ceases. They add that industry and commerce can use land to make even larger contributions to the provincial economy, however they can do so just as readily on poor quality agricultural land. Where does that leave us if we are surrounded by good quality agricultural land, does this mean that we shouldn't allow development and if we do they feel it should cost us an amount of six times the agricultural productivity of land which would be contributed to an agricultural productivity fund. They add that the contribution to the fund should be made by the owner of record after the land looses its agricultural assessment. I would repeat again that cost of development is high and this would add to the cost. The developer would in turn pass the costs on to the homeowner, increasing cost of housing.

The Panel also suggests that municipalities would be responsible for the assessment and collection of the agricultural productivity compensation fund. Should this be a municipal responsibility? Municipal Government was established to provide services to property not to act as a collection agency for the province.

The Panel believes that the fund would provide a powerful incentive for development and developers to avoid better quality agricultural lands and concentrate on parcels of poor quality or lands already withdrawn from the agricultural land base. This would severely restrict development within our boundaries.

. . . 4

Recommendation 6

Future additional country residential lots can be accommodated with minimal impact on the agricultural land base if the suggested guidelines are followed. The Panel is suggesting that regulations under the Planning Act prohibiting subdivision for country residential use within five miles of a town over 5,000 population and corresponding lesser distances for smaller municipalities should be dropped. The Panel also suggests where there is existing country residential with large lots these owners should be encouraged to resubdivide.

The Panel does not seem to be taking into account the problems urban municipalities would encounter if country residential areas were sitting on its doorstep. These residents would use services in the urban municipality and cost of these services would be borne by the urban residents. They also do not recognize that rural municipalities are, in some cases, not equipped to provide essential services such as water and sewer to country residential areas.

Recommendation 10

That the Planning Act and Regulations be amended to provide for the implementation of rural replotting schemes. Many situations could be assisted by replotting property boundaries to be more compatible with topography, drainage, soil condition and physical features such as rivers, railways, etc. Under these circumstances the most equitable solution would be to enable these lands to be exchanged or purchased by the Government for permanent environmental reserves.

This is an ideal recommendation, however one would wonder what the cost would be to the province and in turn to the taxpayers in the province.

Looking at the balance of the recommendations with regard to regulating farming operation, clearing of land, land reclamation, etc., one would get the impression that they are suggesting total control of farming operations. Is this necessary? It would appear that this is over-regulating.

Recommendation 17 through 23

Refer to more research for various reasons and research funds which would be levied on industry. Research now on agricultural land is being carried out by the Province and the Federal Government, is it necessary to add to the costs? If funding for research is established through a levy on sales of production it would increase cost of the product and with the present high costs would it not make it more difficult to sell Alberta products?

. . . 5

Edmonton Metropolitan Regional Planning Commission
Mr. E. L. Dmytruk
Planning Manager
March 13, 1985

Recommendation 28 and 29

We are in agreement that lands and buildings used for primary food production that are annexed to an urban municipality should be treated for assessment purposes, as though they had remained in the rural municipal jurisdiction. It is also agreed that greenhouse buildings and land be assessed as agricultural for municipal tax purposes.

As a general comment we can understand why the Agricultural Panel of the Environment Council of Alberta was formed. We would also agree there must be means for maintaining and expanding the agricultural land base and for maintaining its production, however we would question whether it is necessary to establish an Agricultural Resources Conservation Board and find many of the recommendations either overly restrictive or detrimental to urban municipalities.

Yours truly,

A. M. Gibeault
Town Manager

/dd

RECEIVED
MAR 18 1985
Edmonton Metropolitan
Regional Planning Commission

OFFICE OF THE SECRETARY TREASURER

County of Leduc No. 25

Administration Office
4301 - 50 Street
Leduc, Alberta
T9E 2X3

Telephone 986-2251

March 20th, 1985

Mr. R.G. Madziya, Executive Director
Edmonton Metropolitan Regional Planning Commission
602 Baker Centre
10025 - 106th Street
EDMONTON, Alberta
T5J 1G4

ATTENTION: Mr. E.L. Dmytruk
Planning Manager

Dear Mr. Dmytruk:

RE: Environment Council of Alberta - Summary
Maintaining and Expanding the Agricultural Land Base
in Alberta
Your File No. 473-1

Further to your letter of February 15th, 1985 in regards to the above please be advised that Council at their March 13th, 1985 Council meeting moved to defer discussion on the matter of the Environment Council of Alberta - Summary entitled "Maintaining and Expanding the Agricultural Land Base in Alberta." This matter shall be once again brought to the attention of Council at their April 1985 meeting.

Yours very truly,

FRED A. ROLOF
Secretary-Treasurer

KMS/gm

RECEIVED
MAR 22 1985
Edmonton Metropolitan
Regional Planning Commission

RECEIVED
JUN 10 1985
Edmonton Metropolitan
Regional Planning Commission

473-1

OFFICE OF THE SECRETARY TREASURER
County of Leduc No. 25

Administration Office
4301 - 50 Street
Leduc, Alberta
T9E 2X3

Telephone 986-2251

June 6th, 1985

Edmonton Metropolitan Regional Planning Commission
602 Baker Centre
10025 - 106th Street
EDMONTON, Alberta
T5J 1G4

ATTENTION: Mr. E.L. Dmytruk
Planning Manager
Regional Planning And Research

Dear Mr. Dmytruk:

RE: Environment Council of Alberta - Summary Report and Recommendations
Maintaining and Expanding the Agricultural Land Base in Alberta,
December, 1984
Your File No. 473-1

With reference to your letter of February 15th, 1985 we would advise that Council at their special meeting on May 29th, 1985 gave consideration to the above noted report and its recommendations.

The position of Council with respect to the 29 recommendations is as follows:

Recommendation No. 1

Council support Recommendation No. 1, however, request a further follow up as to the composition of the board, who the board is accountable to, powers of the board, who is responsible for staffing and who funds the operational costs of the board.

Recommendation No. 2

Council support Recommendation No. 2 subject to the following conditions:

a) Urban municipalities have the same responsibility for the preservation of agricultural land.
b) Clarify the role of the Agricultural Resources Conservation Board and the rural municipalities.
c) The agricultural impact assessment take into account the preservation of the agricultural land base for the future and not just for the present time.

Recommendation No. 3

Council support Recommendation No. 3, however, wish to make the following observations:

...../2

a) The economy of the utilization of farm land in urban development should address the impact in the long term rather than in the short term.
b) Weigh the need for the preservation of good agricultural land for the future. Council feel that the Agricultural Resources Conservation Board should be similar to the Energy Resources Conservation Board in that this Board required the oil industry to change their practice of burning waste gases and as a result the oil industry found that this waste product was suitable for the making of other products.

Recommendation No. 4

Council supports Recommendation No. 4.

Recommendation No. 5

Council does not support Recommendation No. 5 in that industry and commercial development can use poorer agricultural land as readily as good agricultural land and should do so.

Recommendation No. 6

Council does not support Recommendation No. 6 and the reason being that Council does not support the subdivision of good agricultural land for country residential purposes.

Recommendation No. 7

Council supports Recommendation No. 7.

Recommendation No. 8

Council supports Recommendation No. 8.

Recommendation No. 9

Council supports Recommendation No. 9.

Recommendation No. 10

Recommendation No. 10 is not necessary in that this provision is presently possible pursuant to Sections 123 to 135 of the Planning Act.

Recommendation No. 11

Council supports Recommendation No. 11.

Recommendation No. 12

Council supports Recommendation No. 12.

Recommendation No. 13

Council supports Recommendation No. 13.

Recommendation No. 14

Council supports Recommendation No. 14.

Recommendation No. 15

Council do not support Recommendation No. 15 and recommend that the wording be as follows "to recognize the importance of grass land and forage crops in maintaining soil quality and productivity and as one of the important tools to restore the productivity of degraded land."

Recommendation No. 16

Council supports Recommendation No. 16.

Recommendation No. 17

Council supports Recommendation No. 17.

Recommendation No. 18

Council supports Recommendation No. 18.

Recommendation No. 19

Council supports Recommendation No. 19.

Recommendation No. 20

Council supports Recommendation No. 20.

Recommendation No. 21

Council supports Recommendation No. 21.

Recommendation No. 22

Council supports Recommendation No. 22.

Recommendation No. 23

Council supports Recommendation No. 23.

Recommendation No. 24

Council supports Recommendation No. 24.

Recommendation No. 25

Council supports Recommendation No. 25.

Recommendation No. 26

Council supports Recommendation No. 26.

Recommendation No. 27

Council supports Recommendation No. 27.

Recommendation No. 28

Council supports Recommendation No. 28.

Recommendation No. 29

Council supports Recommendation No. 29.

The Council wish to make a general statement with respect to this document and this is as follows "the preservation of good agricultural land is not only a responsibility of farmers but as society as a whole."

Yours very truly,

FRED A. ROLOF

Secretary-Treasurer

Ville

5202 - 50 ème rue
C.P. 330
Beaumont, Alta.
T0C 0H0

BEAUMONT

Town

5202 - 50th St.
Box 330
Beaumont, Alta.
T0C 0H0

March 27, 1985

RECEIVED
APR 2 1985
Edmonton Metropolitan
Regional Planning Commission

E.L. Dmytruk, Planning Manager
Regional Planning and Research
Edmonton Metropolitan Regional
Planning Commission
602, 10025 - 106 Street
Edmonton, Alberta
T5J 1G4

Dear Sir:

Thank you for requesting municipal comments regarding Maintaining and Expanding the Agricultural Land Base in Alberta.

Listed are some comments that we feel could be addressed by the Environment Council in its next study.

1. Municipalities already collect many taxes for other corporations. If a tax or fee is to be collected, it will just be another area for which some of the arguments are made with the municipality rather than with the one who imposes the tax. These arguments will have to be included in an already cumbersome development negotiation process.

2. As the cost of good agricultural land should be more than the non-agricultural land, municipalities and developers are likely to choose the less costly method. It is to be remembered that at times, non-agricultural land is not marketable because of its location to the civic centre.

3. Should a municipality surrounded by good agricultural land have more expensive developments (over and above the fair market value), to support agricultural research and development, while other municipal developments need only pay fair market value for non-agricultural land?

I trust these comments will be of some value to you in your research and study of the agricultural land base in Alberta.

Yours truly,

W.S.G. Stewart
Town Manager

WSGS/sd
cc: Monique Plamondon

EL 15THPS'

.1

THE CITY OF St. Albert

ST. ALBERT PLACE
5 ST. ANNE STREET
ST. ALBERT, ALBERTA T8N 3Z9

PLANNING DEPARTMENT 459-1642

File H.9.4

April 11, 1985

Edmonton Metropolitan Regional Planning Commission,
#602 - 10025 106 Street,
Edmonton, Alberta
T5J 1G4

Dear Sirs:

Re: Environment Council of Alberta Report
Maintaining and Expanding the Agricultural
Land Base in Alberta

We wish to advise that the St. Albert Municipal Planning Commission dealt with the above noted item at its meeting held April 10, 1985 and passed the following resolution:

MPC 85-039 That the E.M.R.P.C. be advised that the City of St. Albert has no concern at this time as an urban municipality with the E.C.A.'s report entitled "Maintaining and Expanding the Agricultural Land Base in Alberta", with the exception of recommendation #3. It is our opinion that recommendation #3 may lead to higher urban land costs and added municipal administrative costs.

Yours truly,

D. Wayne Gordon,
Planning Director

/ed

RECEIVED
APR 15 1985
Edmonton Metropolitan
Regional Planning Commission

APPENDIX 2

Appendix 2 Municipal Comments submitted to the Commission with respect to the Commissions's Draft Position

473-2

OFFICE OF THE SECRETARY TREASURER

County of Leduc No. 25

Administration Office
4301 - 50 Street
Leduc, Alberta
T9E 2X3

Telephone 986-2251

RECEIVED
AUG - 9 1985
Edmonton Metropolitan
Regional Planning Commission

August 6, 1985

Edmonton Metropolitan Regional Planning Commission
Suite 600, Baker Centre,
10025-106 Street
Edmonton, Alberta
T5J 1G4

Attention: R.G. MADZIYA, M.C.I.P., Executive Director

RE: Commission Staff Report in Response to the Environment Council of Alberta Report: "Maintaining and Expanding the Agricultural Land Base in Alberta"
Your File: 473-2

This will acknowledge your letter and enclosures dated July 29th., 1985.

This is to advise that a special County Council meeting was held on May 29th., 1985 to review the document and submit Council's position on each recommendation.

We enclose herewith a photocopy of Council minutes for your review and consideration.

Yours truly,

H. Plitt
Heather PLITT
FOR: Ken PINKOSKI
Development Officer

KP/hp

cc:File
Enclosure

File No: 473-2

Town of Morinville

Ville de Morinville

Phone (403) 939-4361

10214 - 100th Avenue
P.O. Box 420
Morinville, Alberta
T0G 1P0

August 14, 1985

Edmonton Metropolitan Regional Planning Commission
Suite 600, Baker Centre
10025-106 Street
Edmonton, Alberta
T5J 1G4

Attention: Mr. Madziya, M.C.I.P.
Executive Director

Dear Sir:

Re: Commission Staff Report in Response to the Environment Council of Alberta Report: "Maintaining and Expanding the Agricultural Land Base in Alberta"
Your File: 473-2

Members of Council reviewed your letter of July 29, 1985 with the enclosed report and I would advise that at the Regular Council Meeting of August 13th motion was passed that the Town has no further Comment to their letter of March 13th.

Yours truly

A.M. Gibeault
Town Manager

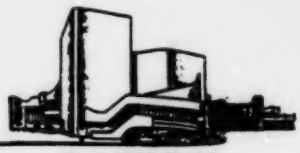
AMG/dms

RECEIVED
AUG 16 1985
Edmonton Metropolitan
Regional Planning Commission

473-2

RECEIVED
SEP 24 1985
Edmonton Metropolitan
Regional Planning Commission

THE CITY OF St. Albert



ST. ALBERT PLACE
5 ST. ANNE STREET
ST. ALBERT, ALBERTA T8N 3Z9

September 20, 1985

File: H.5.4

Edmonton Metropolitan Regional Planning Commission,
#600 - 10025 - 106 Street,
Edmonton, Alberta
T5J 1G4

Attn: Mr. R. G. Madzlya, MCIP,
Executive Director

Dear Sir:

Re: Commission Staff Report in Response to ECA Report:
Maintaining & Expanding the Agricultural Land Base
in Alberta

Thank your for your referral to the subject report to this office for review with your request for comment by September 30, 1985. We note as well the attachment of our earlier response 11/04/85 as an Appendix to your report. Other municipal responses are included as part of the Appendix also.

As we noted in our 11/04/85 reply, we believe Recommendation 5 will ultimately result in higher serviced lot prices (ie. $2,000. +/-per acre) and for this reason cannot support either the Recommendation or the Commission staff position with respect to Recommendation 5. In reviewing the other municipal responses in the Appendix of your report, it is apparent that other metro area urban municipalities (Edmonton, Morinville, etc.) share our concern. With the exception of Recommendation 5, we support the position taken in the Commission staff report with respect to the E.C.A. study.

Yours truly,

D. Wayne Gordon,
Planning Director

DWG/ed

c.c. MPC
Aldermen Shields & Allred

THE CITY OF Edmonton

13th Floor
Phipps McKinnon Building
10020 - 101A Avenue
Edmonton, Alberta
T5J 3G2

PLANNING

RECEIVED
OCT 16 1985
Edmonton Metropolitan
Regional Planning Commission

October 9, 1985

File No.: 53.08

Mr. R. G. Madziya
Executive Director
Edmonton Metropolitan Regional Planning Commission
Suite 600, Baker Centre
10025 - 106 Street
EDMONTON, Alberta
T5J 1G4

Dear Sir:

SUBJECT: Commission Staff Report in Response to the Environment Council of Alberta Report: "Maintaining and Expanding the Agricultural Land Base in Alberta"

This letter is in response to your request for comments regarding the captionally-noted staff report.

At the outset it should be noted that at its regular meeting of September 10, 1985 City Council adopted a position paper highlighting the City of Edmonton's views regarding the Environment Council of Alberta report. A copy of the City's position paper is attached for your information.

The City's position paper commented only on those recommendations which presented potential concerns to the City. Specifically, the paper includes comments on the following ECA recommendations: 1, 2, 5, 6, 28 and 29. Excluding the aforementioned recommendations, the City of Edmonton supports the positions and comments put forward in the revised report (July 9, 1985) prepared by Commission staff.

As the draft E.M.R.P.C. positions regarding recommendations 1, 2, 6, 28 and 29 are generally consistent with the comments embodied in the City's position paper, the City of Edmonton would conditionally support adoption of the E.M.R.P.C. staff's draft recommendations. This conditional support is subject to the minor reworking of the staff recommendations to accommodate the views put forward in the City's position paper.

With regard to the ECA's recommendation (Recommendation #5) pertaining to the establishment of the Agricultural Productivity Fund, the City is strongly opposed to the concept of compensation payments for the loss of agricultural land unless agricultural parcels located within the boundaries of urban municipalities are specifically exempted from the proposed compensation scheme. Without the addition of an urban exemption clause, the City cannot support the E.M.R.P.C. staff recommendation to endorse the ECA's views regarding the establishment and operationalization of the Agricultural Productivity Fund.

Should you have any questions regarding these comments or the City's position paper, please contact Mr. Wayne Cameron at 428-8863.

Yours truly,

Bruce Duncan.

Bruce Duncan
A/GENERAL MANAGER
PLANNING AND BUILDING DEPARTMENT

WFC/24/0/1/L61

Enclosure

APPENDIX 3

Appendix 3 Provincial Government letters submitted to the Commission

ENVIRONMENT

Office of the Minister

132 Legislature Building, Edmonton, Alberta, Canada T5K 2B6 403/427-2391

August 1, 1985

Mr. R.G. Madziya, M.C.I.P.
Executive Director
Edmonton Metropolitan Regional
Planning Commission
#602, 10025 - 106 Street
Edmonton, Alberta
T5J 1G4

Dear Mr. Madziya:

On behalf of the Honourable Fred D. Bradley, Minister of the Environment, I wish to acknowledge receipt of your letter of July 26, 1985, pertaining to the Environment Council of Alberta report, "Maintaining and Expanding the Agricultural Land Base in Alberta".

Please be assured that your letter will be brought directly to the Minister's attention.

Also, I have taken the liberty of forwarding a copy of your letter to department officials, for their information.

Thank you for sharing your advice with our office.

Yours truly,

Tom Thackeray
Executive Assistant
to the Minister

cc: Mr. Ken Smith

0009J

AGRICULTURE

418 Legislature Building, Edmonton, Alberta, Canada T5K 2B6 403/427-2137

Office of the Minister

RECEIVED
AUG - 8 1985
Edmonton Metropolitan
Regional Planning Commission

August 6, 1985

R. G. Madziya, Executive Director
Edmonton Metropolitan Regional
Planning Commission
Baker Centre
602, 10025 - 106 Street
Edmonton, Alberta
T5J 1G4

Dear R. G. Madziya:

On behalf of the Honourable LeRoy Fjordbotten, Minister of Agriculture, I wish to acknowledge receipt of your letter dated July 26, 1985 regarding the Environmental Council of Alberta report, "Maintaining and Expanding the Agricultural Land Base in Alberta."

Please be advised that the Honourable Fred Bradley, Minister of Environment, is responsible for coordinating input to this report. Therefore, I have taken the liberty of forwarding a copy of your letter to Mr. Bradley. Thank you.

Yours truly,

Debbie Gunn

Debbie Gunn (Mrs.)
Secretary to the
MINISTER OF AGRICULTURE

DG/11

cc: Honourable Fred Bradley
Honourable Julian Koziak

MUNICIPAL AFFAIRS

224 Legislature Building, Edmonton, Alberta, Canada T5K 2B6 403/427-3744

Office of the Minister

July 29, 1985

Mr. R. G. Madziya, M.C.I.P.
Executive Director
Edmonton Metropolitan Regional
Planning Commission
Baker Centre
602-10025 - 106 Street
Edmonton, Alberta
T5J 1G4

Dear Mr. Madziya:

On behalf of the Honourable Julian Koziak, I wish to acknowledge receipt of your letter dated July 26, 1985, concerning the Summary Report and Recommendations - Environment Council of Alberta.

Please be assured that your letter will be placed before the Minister for his information.

Yours truly,

Mary Lambrechts
Acting Secretary
to the Minister